



THE CITY OF SAN DIEGO

MEMORANDUM

DATE: July 6, 2011

TO: Honorable Council President Tony Young and Members of the City Council

FROM: Barbara Lamb, Program Manager, Business Office
via Wally Hill, Assistant Chief Operating Officer *Wally Hill*

SUBJECT: Response to Second Rules Committee Request for More Information Regarding
Landfill Preliminary Statement of Work

At the June 22, 2011 Rules Committee meeting, the Committee asked for some more information related to the Landfill Operations Preliminary Statement of Work (Pre-SOW). The committee members' requests are answered in this memo.

1. For each of the existing contracts listed in Attachment 1 [of the Pre-SOW], indicate whether the City or the contracted landfill operator would provide oversight of their work and potential liabilities.

Answer: A revised table of contracts, which identifies who will oversee the contract work and lists associated potential liabilities, has been included in the revised Pre-SOW. To the extent that any contract is utilized for activities related to regulatory and lease requirements, the ultimate responsibility of compliance and liability will be with the City.

The City will likely continue to oversee contracts associated with landfill maintenance and monitoring. This includes engineering service providers that perform gas and groundwater monitoring services. The Statement of Work (SOW) team will determine where oversight falls for the remaining contracts. Some of the current contracts may no longer be needed if their specific functions are included in the SOW and a private contractor wins the bid. For example, if a private contractor wins the bid, the Hawthorne Machinery contract may be replaced by the service provider's own equipment or a vendor's equipment of their choice. Alpha Project is another example of a contractor not using the City's current vendors if they win the bid. Alpha Project currently provides manual labor (i.e., litter control) at the landfill; however, a private contractor may choose to use their own force or another contractor to

provide the same services. Alternatively, contracts for generic services such as security, septic tank pumping, and pest control may be kept and overseen by the City.

2. In the "Performance Standards" chart that starts on page 9 [of the Pre-SOW], indicate that the measures are annual ones, unless they are not. In particular, for the last one on groundwater, is it 100% of both quarterly and annual reports, or are they just annual reports?

Answer: The majority of the measures in the Pre-SOW are measured on an annual basis, and the Pre-SOW has been annotated to reflect this. Two measures reference quarterly and annual reports. For the last measure on groundwater, percent of NPDES permits complete, quarterly inspections are conducted on the City's landfill sites in addition to an annual report that is submitted to the regulatory agency. This report includes information from all quarterly inspections as well as water sampling data taken throughout the year.

3. Can we provide incentives if the airspace utilization standard is better than required and sanctions if below?

Answer: Yes, this can be included in the SOW.

4. Discuss the impacts of last week's City Attorney opinion regarding enforcement activities.

Answer: As the Memorandum of Law on the Enforcement Functions at the Miramar Landfill stated, there are "legal limitations on an external service provider performing solid waste inspections, investigating incidents involving the disposal of hazardous waste and other unacceptable waste, and engaging in enforcement action." An external service provider can observe and document unlawful disposals, but only designated enforcement officials can enforce violations of the Municipal Code and the Health and Safety Code.

To place this issue in context, City staff has conducted a survey to learn more about enforcement activities at other California landfills. The results are presented in Attachment 1 to this memo.

Currently four California jurisdictions own landfills that are operated by a private contractor, and one of these jurisdictions, operates seven landfills in this manner. A fifth jurisdiction provides public sector load check and fee booth functions on a privately owned landfill. Of these five jurisdictions, three contract out their load check function, but no on-site staff has the authority to actively enforce violations. Two public agencies retained the load check function but neither has any enforcement authority. In all five examples, the investigation and identification of hazardous and other unacceptable waste was handled by the provider (public or private) with enforcement action deferred to the appropriate external agency (Department of Environmental Health, District Attorney) when a violation was found. The City of San Diego is unique in its approach as it provides officials the ability to enforce violations at the landfill. If the City wants to maintain its enforcement authority at the landfill the City must retain the staff associated with enforcement because private contractors will not have the ability to perform enforcement actions.

5. Impacts of bird control requirements on lease and on military operations.

Answer: In recognition of the location of Miramar Landfill leased property and its proximity to the operations and flight patterns for military aircraft Section 19 of the Ground Lease with the United States Navy requires that the leased property be used at all times in strict accordance with special restrictions made necessary by the nature of the military mission and operation. Section 19(1) requires that the City will at all times use the leased property so that activities are in conformance with the Marine Corps Air Station's Bird Air Strike Hazard (BASH) Management Plan.

The overall goal of the City's Bird Control Program is to ensure that birds of targeted species do not seek out the landfill as a roosting and food source. This is done by ensuring that visiting birds of these species are repelled through a variety of measures. The program is designed to avoid bird-aircraft strikes and to enhance the safety and hygiene of the site. The Program is operated very effectively with detailed implementation guidelines. As a result, the SOW Team may choose to include the guidelines and procedures currently utilized to mitigate the possible risks associated with contracting the function out to an operator with less or no experience operating a landfill in such close proximity to an airfield. However, this must be balanced with the principle not to unduly constrain the proposers' ability to conduct the contracted work independently.

6. Provide timeline for military approval.

Answer: The Navy and Marine Corps have been made aware in writing that the city is now engaged in the process of managed competition of our landfill operations (see Attachments 2 and 3 to this memo). Additionally, the Mayor and City staff have briefed the military regarding this process. The military recognizes that the complexities of managed competition are far fewer than those that might have arisen under divestiture. The military has expressed that it will consider a potential winning private contractor in a timely manner in accordance with the terms of the lease, which grants the military the final say over a significant private contractor operating on the landfill. They have asked that the City continue providing updates on the status of the managed competition and expressed the following preferences as competition moves forward, which the City will fulfill: that the City retain oversight of the landfill, particularly with respect to environmental issues, that the Navy continue to receive free waste disposal, and that the landfill gas collection system and cogeneration facilities agreements be maintained. The military did not express any other concerns with the process at this point but does not have a timeline for approval that it could provide in writing.

For context, the military has historically evaluated each potential private contractor operating on the landfill on a case-by-case basis. However, Section 29 of the Ground Lease states that where the Navy's consent or approval is required or necessary, the consent or approval shall not be unreasonably withheld. The following table provides examples of four contracts that did require military approval and indicates the approval timelines.

Contractor	Date Project Submitted	Date Approval Received	Level of Approval	Date Approved by City	Comments
Superior Rock	May 6, 1991	Aug 22, 1992	The EA was handled by NAS Miramar staff, but Southwest Division handled the lease amendment	Oct 26, 1992	The City began this project in 1988 by issuing an RFP. The negative declaration and EA were handled jointly. Thus military approval did not delay the project.
West Miramar Landfill Ht Increase	Sept 2004 requested 60' height increase for WML.	Sept 2005 given permission to apply for a 20' height increase; final approval February, 2009.	Local flight operations; Washington DC flight operations; MCAS Deputy Director of Installations and Logistics, NEPA Cat Ex	Oct 3, 2007 EIR certified and SDP approved	Other than the original year-long delay needed to complete flight operation review, and a few months of delay coordinating the final press conference, no delays in this project were caused by the military process. From Fall 2005 to Fall 2008 numerous studies were done and permits were obtained. Military approval could not occur until these other hurdles were completed.
Allan Company	Oct 27, 2009	Nov 16 2009	Land Use and Real Estate for the MCAS Commander Officer	Dec 17, 2009	
Fortistar	June 2, 2011	June 13, 2011	Real Estate Contracting Officer for the Commander Officer of Naval Facilities Engineering Command	June 14, 2011	The contract with Fortistar was a lengthy process; however, that process was completed prior to requesting military approval.

7. Address fee booth controls.

Answer: The Environmental Services Department has asked the Office of the City Treasurer to conduct a review of the fee booth operation, to provide its assessment of the current money handling controls, and to suggest areas for improvement. This assessment is currently underway and any recommended improvements will be implemented. The SOW team will include as appropriate the feedback from the Treasurer review. (The Office of the City Auditor declined to conduct this review due to other workload demands.)

8. Provide a copy of the divestiture study to all Council members for review.

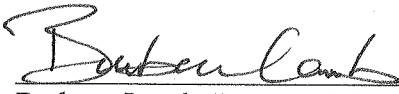
Answer: The firm that advised and assisted the City on preparing for potential landfill divestiture and helping identify and review potential bidders did not generate a study. As previously reported to the City Council, the scope of services provided by the firm included both consulting and legal services. Specifically, the firm was responsible for advising the City on matters related to the proposed divestiture, which included providing assistance in soliciting interest and reviewing preliminary responses; as well as advising the City on

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environmental implications, potential lease and merger issues, as well as anti-trust and other legal matters as they arose during the process.

In addition to answering these items for the Committee, staff has revised the attached Preliminary Statement of Work.


Barbara Lamb, Program Manager

cc: Jay Goldstone, Chief Operating Officer
Grace Lowenberg, Deputy City Attorney
Chris Gonaver, Environmental Services Department Director
Andrea Tevlin, Independent Budget Analyst

Attachment 1 – Load Check/Enforcement Research
Publicly Owned/Private Operated Landfill Comparison

Jurisdiction	Landfill(s)	Owner/ Operator	Contractor	Load Check Operator	Enforce- ment Authority ¹	Notes
San Joaquin County	Foothill Sanitary Landfill	Public/ Private	Nomellini Construction, Republic Svcs	Private	No	<ul style="list-style-type: none"> No County staff on-site to provide contractor oversight Contractor identifies, removes, and stores unacceptable waste; County properly disposes of unacceptable waste
Tehama County	Red Bluff Landfill	Public/ Private	Waste Connections (Madera Disposal Systems)	Private	No	<ul style="list-style-type: none"> Annual report to County is only method of contractor oversight Contractor identifies, removes, stores, and properly disposes of unacceptable waste
Sonoma County	Central Disposal Site	Public/ Partially Private	Republic Services	Public	No	<ul style="list-style-type: none"> Sonoma County retained fee booth operations and load check County identifies, removes, stores, and properly disposes of unacceptable waste
County of Riverside	El Sobrante Landfill	Private/ Partially Private	Waste Mgmt (USA Waste Svcs)	Public	No	<ul style="list-style-type: none"> County identifies, removes, stores, and properly disposes of unacceptable waste
County of San Bernardino	1. Mid-Valley Landfill 2. Barstow Landfill 3. Big Bear Landfill 4. Colton Landfill 5. Landers landfill 6. San Timoteo Landfill 7. Victorville Landfill	Public/ Partially Private	Burrtec	Private	No	<ul style="list-style-type: none"> County retained fee booth operations to avoid issues relating to conflicts of interest, money handling, the discretionary assessment of fees, and tonnage tracking and reporting to the State Four fulltime County staff provide contractor oversight for the seven landfills Contractor identifies, removes, stores, and properly disposes of unacceptable waste Haulers have complained about inequity of Burrtec's load check function; Waste haulers feel Burrtec inspects Burrtec haulers more leniently for unacceptable waste than other haulers
City of San Diego	Miramar Landfill	Public/ Public	N/A	Public	Yes	<ul style="list-style-type: none"> City identifies, removes, stores, and properly disposes of unacceptable waste City also has the authority to enforce violations unlike any of the other landfills in this list

¹ Enforcement authority is the ability to enforce violations, which includes the power to issue notices of violation and field citations, inspect public and private property, and arrest without warrant any person whenever the officer or employee has reasonable cause to believe the person is in violation.

Attachment 2 – April 20, 2011 Letter to Navy & Marines (page 1 of 2)



THE CITY OF SAN DIEGO

CONFIDENTIAL REAL PROPERTY NEGOTIATION

April 20, 2011

Via Email: karen.ringel@navy.mil and U.S. Mail
Christopher.manis@usmc.mil and U.S. Mail

Ms. Karen P. Ringel, Director
Real Estate Asset Management
Department of the Navy
Naval Facilities Engineering Command Southwest
1220 Pacific Highway
San Diego, CA 92132-5190

Mr. Christopher Manis, Deputy Director
Installations and Logistics
Marine Corps Air Station Miramar
P.O. Box 452013, Building 6311
San Diego, CA 92145

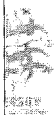
Re: City of San Diego's Proposed Managed Competition of Miramar Landfill

Dear Ms. Ringel and Mr. Manis:

Thank you for the opportunity to meet with you and other Navy and Marine Corps representatives to discuss the City of San Diego's (City) proposed managed competition of the Miramar Landfill. In response to your request and in accordance with Section 12 of our Ground Lease, please consider this letter official notice of the City's intentions in that regard.

In mid-February, the City announced that it would be moving forward with possibly outsourcing Miramar Landfill operations through managed competition, which allows private firms to compete against city workers for jobs. Attached is a copy of the redacted Pre-Competition Assessment Report (PCA) which sets forth the rationale for putting certain functions at Miramar Landfill into competition. In determining if a function is appropriate for competition, consideration is given to factors such as the type of service provided, the abilities of the competitive market, potential efficiencies that could be achieved, the capacity of the City to deliver services in the event of contractor default, and the ability to maintain service quality and protect the public interest.

Based on the findings of the PCA, a Preliminary Statement of Work (Pre-SOW) will be prepared. At this time, we anticipate presenting the Pre-SOW to the City Council for approval sometime in June 2011. The Pre-SOW will document the service levels associated with the



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Attachment 2 – April 20, 2011 Letter to Navy & Marines (page 2 of 2)

delivery of the functions(s) selected for competition. Provided that the City Council approves the Pre-SOW, these service levels will then be incorporated into a Request for Proposals (RFP), which is currently scheduled for release in November 2011. Responses to the RFP would be due in January 2012, with a decision to award following shortly thereafter. As information becomes available, please inform us as soon as you can where in our process you would like to be updated. Additionally, we would like to be made aware of your anticipated process and timeline for providing written consent under the Ground Lease in the event the managed competition process results in a proposed award to a private contractor.

Regardless of the outcome of the managed competition process, the City will retain its responsibilities under the Ground Lease, as well as retain all responsibilities for establishing fees at Miramar Landfill; closure and post-closure, corrective action, and regulatory obligations; and the management of third-party contracts such as those for operation of the Recycling Center and Household Hazardous Waste Transfer Facility. Disposal of Navy and Marine Corps waste will continue free of charge in accordance with the Ground Lease. Further, the process will not include the Biosolids Center and operations, or the Co-Generation facilities or operations.

In closing, I appreciate the Navy and Marine Corp's willingness to work with us on this important matter. We look forward to scheduling periodic meetings to keep you apprised of the status of this endeavor. In the interim, please do not hesitate to contact myself or Barbara Lamb, Program Manager, Business Office at (619) 236-7789 if you have any questions or wish to schedule a meeting at any time.

Sincerely,



Chris Gonaver
Environmental Services Director

Attachment

cc: Mayor Jerry Sanders
Jay Goldstone, Chief Operating Officer
Captain S. Keith Hamilton, Commanding Officer NAVFAC Southwest
Colonel Frank A. Richie, Commanding Officer, MCAS Miramar
Charles Chambers, Esq.
John Stinson, Esq.
Wally Hill, Assistant Chief Operating Officer, City of San Diego
Barbara Lamb, Business Office
Aimee Udrys, Deputy Director of Intergovernmental Relations and Fiscal Policy
Grace Lowenberg, Deputy City Attorney

Attachment 3 – May 26, 2011 Letter to Navy & Marines (page 1 of 2)



THE CITY OF SAN DIEGO

May 26, 2011

Via Email: karen.ringel@navy.mil and U.S. Mail
Christopher.manis@usmc.mil and U.S. Mail

Ms. Karen P. Ringel, Director
Real Estate Asset Management
Department of the Navy
Naval Facilities Engineering Command Southwest
1220 Pacific Highway
San Diego, CA 92132-5790

Mr. Christopher Manis, Deputy Director
Installations and Logistics
Marine Corps Air Station Miramar
P.O. Box 452013, Building 6311
San Diego, CA 92145

Re: City of San Diego's Proposed Managed Competition of Miramar Landfill Operations

Dear Ms. Ringel and Mr. Manis:

This letter is a follow-up to my letter to you dated April 20, 2011. The purpose of this letter is to provide a brief update on the managed competition process for Miramar Landfill operations and to request some information in response to questions recently raised by San Diego City Council members.

The Mayor presented the Preliminary Statement of Work (PSOW) to the City's Rules Committee for consideration on May 18, 2011. (This is the same PSOW I included with my April 20, 2011 letter to you.) The Committee heard considerable public comment at that meeting, after which Council members generated a list of action items for a follow-up Committee hearing, presently scheduled for June 22, 2011. One of the follow-up items concerns the Navy's and Marine Corps' preliminary reaction to the proposed managed competition of the Miramar Landfill operations. Specifically, the City requests written confirmation: (1) that the Navy and Marine Corps are aware that the City is engaged in the managed competition process for Miramar Landfill operations; and (2) that the Navy and Marine Corps do not object to the City proceeding with the managed competition process at this time, subject to a reservation of all rights under section 12 of the Ground Lease with respect to final approval of a proposed transaction, if any, with a third party for operations at the Miramar Landfill. Please also include in your reply correspondence:



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Attachment 3 – May 26, 2011 Letter to Navy & Marines (page 2 of 2)

(3) any reservations the Navy and Marine Corps may have about the managed competition of the Miramar Landfill operations, or any other input, which you are in a position to share with the City at this time; and (4) a general description of your anticipated process and estimated timeline for making a decision about whether to grant consent under the Ground Lease, in the event the managed competition process results in a proposed award to a private contractor.

As you may know, the requested information is of fundamental importance to the City as it begins to move through the managed competition process for these very significant City operations. The more input the Navy and the Marine Corps are able to provide up front, the better the outcome for all concerned. To that end, the City would appreciate a response to this letter before June 22, 2011, when the Rules Committee is scheduled to meet again to consider the PSOW.

If there is any information the City can furnish you to assist in your reply to this letter, please don't hesitate to contact me at (858) 573-1212.

Sincerely,



Chris Gunaver
Environmental Services Director

cc: Mayor Jerry Sanders
Jay M. Goldstone, Chief Operating Officer
Wally Hill, Assistant Chief Operating Officer
Barbara Lamb, Business Office
Almis Udrys, Deputy Director of Intergovernmental Relations and Fiscal Policy
Grace Lowenberg, Deputy City Attorney
Captain S. Keith Hamilton, Commanding Officer NAVTAC Southwest
Colonel Frank A. Richie, Commanding Officer, MCAS Miramar
Charles Chambers, Esq.
John Stinson, Esq.

Landfill Operations Preliminary Statement of Work
July 6, 2011

Landfill operations are one of the responsibilities of the City of San Diego's Environmental Services Department.

Functions and Services

The Landfill functions include:

- Landfill Operations
- Greenery Operations
- Hazmat Landfill Load Check
- Fee Booth Operations
- Landfill Maintenance and Monitoring (LMM)

The City of San Diego intends to acquire the services of a provider (City employees or outside vendor) to operate its active landfill operations at the West Miramar Landfill as well as the City's eight closed landfills and eight burn sites.

The City will retain responsibility for environmental compliance, enforcement, franchise and fee booth oversight, and the Ground Lease with the U.S. Navy. Functions related to enforcement include Fee Booth Operations, Hazmat Landfill Load Check and Greenery Operations. Therefore, a portion of operations will be removed from competition to ensure these responsibilities are met.

The services that will be considered include:

Activity ¹	Detailed Description
Landfill Operations	
Push, compact and cover waste	<p>Receive and push waste to desired location at landfill face; Compact waste to reach desired density; Cover waste with appropriate daily, intermediate and final cover (i.e., tarp, dirt, alternative daily cover); Maintain commercial and public tipping areas. Excavate, stockpile and transport cover material as needed. Use an Automated Tarping Machine (ATM) to deploy reusable landfill cover tarps and preserve the space of the landfill. To accommodate the ATMs need to deploy tarps on a relatively flat surface to avoid damage to machinery and/or adjacent slopes, apply dirt and/or mulch in the corners to square-up tarp placement. Per the Local Enforcement Agency (LEA) restrictions, tarps can only stay deployed on the trash for three days before having to be removed and trash slopes covered with an advancing trash face or an approved daily cover practice. Minimize edge dirt and mulch as ADC usage to the maximum extent possible, but exterior slopes and the top deck still need at least 6-inches of cover on a daily basis.</p> <p>In extreme inclement weather when it is not possible for the dozer mounted ATM to traverse the saturated trash face to deploy the tarps and dry dirt is not possible to access, the daily cell may be covered with mulch as ADC.</p>

¹ Many of the activities performed at the active and inactive landfill sites are supported by private contractors. Attachment 1 provides a list of contracts associated with landfill operations.

Activity ¹	Detailed Description
	To stay in compliance with current regulations for areas that will not receive trash for 180-days, use 12-inches of dirt as intermediate cover.
Maintain landfill roads	Pave or surface landfill roads to ensure vehicle access to landfill and prevent the formation of habitat; Repair roads as needed (i.e., ruts, potholes, cracking).
Install and maintain drainage control devices	Construct drainage control structures; Repair and/or replace structures as needed to protect landfill from erosion, and prevent the formation of habitat.
Manage and maintain leachate collection system	Leachate collection system includes below ground collection tanks, pumps to above ground tanks for storage until discharged into trucks for appropriate application of the operating landfill face.
Perform surface grading and maintenance	Landfill surface shall be graded as needed to prevent erosion, cover exposed trash, assist in drainage, and prevent standing water and the formation of habitat.
Install and maintain erosion control devices	Install erosion control devices; Repair and/or replace devices as needed to protect landfill from erosion.
Perform control duties	Perform traffic, litter, dust (includes the spraying of reclaimed water on roads and other areas of landfill including dusty refuse loads to prevent fugitive dust and avoid violations and impacts to air quality), leachate (see manage and maintain leachate control system above), vector and bird control.
Install and maintain landfill signs	Install road, traffic control, safety, and facility signs; Repair and/or replace signs as needed including signs with habitat-specific instructions.
Landfill Engineering	Design landfill modules, daily cells, special waste areas, wet weather areas and the sequence for filling; Design and oversee construction of temporary and permanent haul roads and access roads; Design drainage and erosion control structures; Survey and stake daily cells; Manage clean fill dirt program; Prepare and submit monthly, quarterly, and annual reports to regulatory agencies as required; Participate in regulatory inspections as City representative; Ensure compliance with permitting requirements; Provide support for Miramar CIP project development (i.e. project estimates, contract specifications, construction management); Serve as liaison with Navy on lease issues and projects; Support departmental construction projects; Review technical documents from contracted consultants (i.e., lab testing, etc.); Plan and execute topographical mapping at active and inactive sites; Maintain surveying control networks; Advise and survey for drainage maintenance at inactive sites; Establish computer aided design and drafting files, scaled drawings, diagrams, and field notes of active and inactive sites.
Greenery Operations	
Process Materials	Receive and mix food waste with ground green waste; Remove undesirable plants, and physical contaminants; Mix automated yard waste with brush and landscaper waste; Clean contamination from automated yard waste routes.
Grinding material	Grind yard waste to suitable size for windrow composting; Grind custom order and specialty products per customer request; Grind dimensional lumber, wood pallets, stumps, and logs for sale as recycled landscape product; Re-grind materials as needed.
Forming and moving windrows	Create triangle or trapezoidal shaped windrows with 40-50% moisture content; Create windrows in batches of 5,000 cubic yards and with the size and shape to accommodate aeration from a straddle windrow turner.
Aerating windrows	Aerate windrows using windrow turner at scheduled intervals.
Add water to composting windrows	Add water to windrows as needed to maintain a 40-50% moisture ratio.
Screen products	Screen compost and other products into specified sizes and to remove

Activity¹	Detailed Description
	physical contaminants.
Air classification cleaning	Use air knife at appropriate setting to remove the majority of light plastic from the final product.
Product blending	Blend custom products as requested by customers.
Color products	Apply water and dye to pre-ground dimensional lumber.
Residue disposal	Remove, dump and replace contamination collection boxes as needed; Remove other composting process residues.
Process drywall	Receive and mix drywall as appropriate to add value to compost.
Process food waste	Receive and mix food waste with ground green waste at appropriate ratio; Place mixture into windrows.
Load customers	Load material purchased by customers into vehicles.
Perform control duties	Perform traffic, litter, dust (includes the spraying of reclaimed water on roads and other areas of landfill including dusty refuse loads to prevent fugitive dust and avoid violations and impacts to air quality), leachate (see manage and maintain leachate control system under Landfill Operations), vector and bird control.
Perform quality control functions	Monitor contamination in incoming loads, remove contamination from outgoing products, refer to City staff to enforce and assess penalties, and product sampling.
Market material	Provide market value pricing of commodities; Advertise products on City's website, at various community events, and in Curbsider mailer to all curbside customers; Provide material at no cost to open and closed sites for landfill erosion control.
Research and development to increase diversion	Assist and coordinate testing and evaluation of compostable feedstock currently being landfilled.
Hazmat Landfill Load Check – Program operated under supervision of City enforcement staff	
Conduct solid waste inspections	Conduct inspections at commercial and public tipping, construction and demolition, greens, roadside, and Fee Booth locations; Document inspections and enter into Access database for tracking.
Unacceptable waste identification	Identify unacceptable waste through solid waste inspections; Remove hazardous waste and other prohibited waste; Return waste to generator or take waste into possession and dispose of material at appropriate location.
Investigate incidents involving the disposal of hazardous waste and other unacceptable wastes	Determine origin of unacceptable waste through data obtained on waste, interviews, reviewing disposal documents, or other materials contained in the same load.
Public education	Distribute and review educational materials with residential and business customers on proper waste identification and provide options for the proper disposal of unacceptable wastes.
Enforcement	City staff will determine appropriateness of enforcement action and the level of enforcement needed; Provide a verbal warning, issue a Notice of Violation, and/or refer an incident to a regulatory agency or to the City or District Attorney for additional investigation and enforcement. Inspectors will provide incident documentation, draft case reports or incident summaries, and obtain and process samples of prohibited waste for laboratory analysis
Hazardous waste management	Identify hazardous waste including conducting hazardous waste identification testing for unknown substances. Package and manage hazardous waste onsite at the Miramar landfill in accordance with all applicable regulatory requirements, conduct weekly inspections, coordinate disposal, review invoices, manifest and waste diversion tracking.

Activity¹	Detailed Description
Special waste review and acceptance	Review and process all requests for the disposal of various types of special waste and review supporting documentation such as Materials Safety Data Sheets and laboratory analysis to determine if special wastes can be accepted in compliance with State and federal requirements, Miramar Landfill acceptance criteria, and permit restrictions. Review and process all Special Waste Manifests and enter data into an Access database for tracking.
Emergency response	Respond to, mitigate, clean-up, and complete required regulatory reporting for releases of hazardous substances and provide temporary onsite incident management for situations involving the disposal of explosives and other shock sensitive chemicals requiring a response from City or County Fire, Hazmat, or Metro Arson Strike Teams.
Training	City staff will provide initial and refresher training to landfill staff on hazardous materials recognition, special waste acceptance documentation and processing, spill reporting, and other applicable topics.
Fee Booth support	Respond to daily calls from the Fee Booth to provide waste evaluation and acceptance expertise to customers with potentially unacceptable wastes, prevent the acceptance of prohibited wastes, provide education on proper disposal, and refer to City staff for enforcement as required.
Fee Booth Operations	
Inspect material type	Inspect incoming load type and assess appropriate fee.
Assess appropriate tipping fees	Calculate total fees due by the incoming tonnage and load type; Process outgoing transactions such as commodity sales, held transactions, and customer rebilling (when appropriate fee was not applied).
Screen for illegal material	Screen incoming material for items not allowed in landfill; Notify Hazmat Landfill Load Check staff for assistance in identifying unacceptable waste.
Comply with regulations	Ensure compliance with State minimum regulations (i.e., record keeping, traffic control, scale accuracy, and proper revenue collection).
Collect, input, reconcile data	Collect tonnage and revenue data in Refuse and Disposal (RAD) database (power builder application used for collecting, monitoring, and reporting landfill tonnage and revenue information); Reconcile data as needed.
Cash and check handling and accounting	Collect cash and check payments; Complete deposit slips; Coordinate armored transport; Coordinate with bank to ensure accuracy of daily deposits; Manage deferred accounts.
Customer service	Provide information on commodity sales, unacceptable waste, alternative disposal locations, and general landfill information.
Landfill Maintenance and Monitoring – Program operated under supervision of City environmental monitoring staff	
Landfill gas [LFG] monitoring & collection	Conduct quarterly LFG surface emission surveys, building methane detector checks, and read monitoring probes; Conduct monthly extraction well monitoring and adjustments; Read flares weekly; Manage condensate collection and disposal; Prepare survey result maps and monitoring reports.
Landfill gas [LFG] system maintenance	Repairs to the LFG systems include monitoring probes, extraction wells, well heads, piping, condensate traps, valves, vaults, flare stations, air compressors, pumps, sumps, blowers, controls, etc; Respond to changes in regulatory requirements; Respond to flare system shutdowns and building methane detector alarms.
Groundwater monitoring and maintenance	Assist groundwater consultant to access for sampling groundwater wells; Respond to changes in regulatory requirements; Maintain the integrity of groundwater monitoring wells, including monuments, well heads, pumps and tubing.
Inactive landfill surface maintenance	Maintain, repair and upgrade drainage structures, landfill cover, and access roads located on and adjacent to the landfill sites including complying with any regulatory requirements for this work; Conduct monthly site inspections

Activity ¹	Detailed Description
	and prepare and submit monthly reports for City review and submission to LEA; Maintain access to all extraction wells, monitoring wells (probes), and groundwater sampling wells; Respond to changes in regulatory requirements; Manage weed abatement, mowing, fencing, and general site condition.
NPDES sampling	Perform quarterly inspections, and collect samples (as required by specified storm events), analyze data and prepare reports for City review and submission of annual National Pollutant Discharge Elimination System (NPDES) reports.
Burn site management	Inspect burn sites to ensure ash has not been exposed due to erosion of cover material; Cover exposed ash as needed; Maintain drainage structures and implement erosion control methods to protect site against erosion; Respond to changes in regulatory requirements.
Biological Services	Seed mix design/construction, biological site visits, biological surveys, project monitoring, training of crews on pertinent issues, such as vernal pool formation, tern and gnatcatcher nesting seasons, and seagull behavior.

As described in the Pre-Competition Assessment (PCA) Report, fee calculation and adjustments remain the responsibility of the City, no matter who provides the service of landfill operations. "Disposal fees at the Landfill must continue to comply with San Diego Municipal Code sections 66.0127(c)(4) and Proposition 26, approved during the November 2010 election, which set cost recovery limitations on disposal fees, regardless of any outsourcing. The expenditure of revenues from Landfill fees also will remain subject to existing legal requirements and restrictions. In other words, retaining a private entity to operate the Landfill would not provide any greater flexibility in setting Landfill fees or using Landfill fee revenues."

Services that will not be included in this competition are the Fee Booth activities related to franchise administration, enforcement activities, supervision of the Hazmat Load Check activities, and the Landfill Maintenance and Monitoring (LMM) activities related to project management, regulatory compliance, and strategic planning. The remaining activities that make up the Fee Booth and LMM functions are eligible and appropriate for competition.

City-wide administrative support services such as budget and information technology administration, group policy and procedure development, and management reporting may be impacted as a result of the managed competition process. It is not exactly clear at this time how administrative service positions will be impacted as a majority of staff members perform duties in other functions not considered for managed competition. However, if the City is no longer providing all or a portion of the functions included in the competition, a corresponding reduction must be considered to the related positions and services. These determinations are made when proposals are evaluated, to identify continuing government costs associated with the proposals.

The budgeted Supervising Management Analyst position provides oversight of the Fee Booth Operation function and serves as the Franchise Administration Program Administrator. The City of San Diego's Non-Exclusive Solid Waste Collection system consists of 21 franchisees that have been granted permission to collect, transport and

subsequently dispose of waste within the City of San Diego. This position is also in charge of the development and implementation of Departmental policies regarding administration of the franchise program, and the implementation of new policies and procedures regarding all aspects of the franchise program (i.e., contracts, tonnage and revenue reporting, accounting tasks). The policy decisions made by the franchise administrator have a direct impact upon revenue generated for the City's General, Refuse Disposal Enterprise, and Recycling Funds. As a result, this function was deemed inherently governmental, ineligible, and inappropriate for competition.

Although not deemed inherently governmental, a portion of the activities performed within the LMM function are ineligible and inappropriate for competition as potential risks and increased liability are too high while economic benefits are very low. These activities are performed by 1.00 Sr. Civil Engineer, 1.00 Sr. Mechanical Engineer, and 3.00 Associate Civil Engineers and can be categorized into project management, regulatory compliance, and strategic planning.

Landfill operations require the oversight of a Civil Engineer/Project Manager for regulatory compliance and project management oversight of Capital Improvement projects and ancillary construction projects. These activities are currently performed by a Project Officer II and an Associate Civil Engineer.

In addition, legal limitations exist on outsourcing enforcement functions related to Landfill operations such as Code Compliance and Hazmat Load Check functions. The City Attorney has provided a legal opinion (MOL 6-16-2011) on whether duties performed by Enforcement Officials, as defined by the San Diego Municipal Code, can be delegated to private contractors. In light of the City Attorney opinion, three positions will be held out of the competition and remain as City staff to provide oversight of the load check activities and enforcement.

Locations and Operating Hours

The services described above are currently provided at the following locations with their respective hours of operation, which will be maintained for the duration of the contract resulting from this competition, unless the City Council specifies different days and/or hours of operation:

Function	Location	Hours of Operation
Landfill operations	West Miramar Landfill	The landfill is open 361 days per year (362 days in a leap year) and accepts waste for disposal from 7:00 am to 4:30 pm Monday through Friday and from 7:30 am to 4:30 pm on Saturday and Sundays including most holidays except New Year's Day, Easter Sunday, Thanksgiving Day and Christmas Day. It is the only disposal site in the County that is open on Sundays.
Greenery operations	West Miramar Landfill	Same as Landfill Operations
Hazmat Landfill load check	West Miramar Landfill	Same as Landfill Operations
Fee booth operations	West Miramar Landfill	Same as Landfill Operations

Landfill maintenance and monitoring	8 closed landfills 8 closed burn sites West Miramar Landfill	Monday through Friday
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Technical Delivery Standards

The City of San Diego expects the service provider (City employees or outside vendor) will perform these services while adhering to the following technical standards:

Regulatory Agencies

Regulatory mandates established by federal, State, and local agencies including the following:

- United States Environmental Protection Agency (EPA)
- United States Fish and Wildlife Service (Department of Interior)
- United States Army Corps of Engineers (Department of Defense)
- United States Department of the Navy and Marine Corps (Department of Defense)
- Naval Facilities Engineering Command (NFEC) (within the Department of the Navy)
- Marine Corps Air Station (MCAS) Miramar (within the Department of the Navy)
- Federal Aviation Authority (FAA)
- CalRecycle
- California Department of Fish and Game
- California Air Resources Board (CARB)
- California Department of Toxic Substance Control
- California Office of Environmental Health Hazard Assessment
- California Department of Conservation
- California Department of Water Resources
- San Diego County Air Pollution Control District (APCD)
- San Diego Regional Water Quality Control Board (RWQCB)
- City of San Diego Solid Waste Local Enforcement Agency (LEA)
- City of San Diego Development Services Department
- City of San Diego City Council
- San Diego Regional Airport Authority
- County of San Diego Department of Environmental Health
- County of San Diego Department of Public Works, Land Use Environment Group
- San Diego Association of Governments serving as the Local Task Force

Various City staff interact with the agencies in a wide variety of capacities. Technical experts, such as engineers and planners, are the most common points of contact, but management and even the Mayor's Office may become involved in regulatory matters from time to time. Typical contact scenarios include requests for permits or information, submission of reports and notifications, participation in inspections. Contact is both formal and informal.

There are a variety of risks associated with the failure to comply with established regulations. As noted in the Pre-Competition Assessment, a notice of violation could result in “fines up to \$10,000 a day for non-compliance with federal, State, and local regulatory standards.” These fines are assessed per violation, and multiple violations, over the course of several days, would be additive. Additionally, mitigation measures with limitless costs may be imposed, as can additional civil and criminal penalties. The sensitive activities that occur at Miramar and other disposal sites are subject to highly complex regulations. In addition, the Statement of Work team must ensure that the service provider performs any new activities required to ensure compliance with future regulations. Future regulations are difficult to forecast, but are common because landfill systems and the regulatory structure are dynamic in nature. Whether the landfill is operated by public employees or a private contractor, the risks associated with non-compliance of current and future regulations could result in threats to public health and safety, the environment, and can expose the City to severe financial and potentially criminal penalties.

The Statement of Work team will determine the specific tasks the City and contractor will perform in terms of regulatory and permitting responsibilities. However, the ultimate responsibility of meeting all regulatory and permitting requirements will in most cases continue to rest with the City. For example, the Statement of Work team may decide that the landfill operator will prepare regulatory reports to the various regulatory agencies, but the City will be reviewing these reports and will likely be held responsible for any notice of violation as a result. It is not always the case that the City would be responsible. For example, if a contractor were to push brush into a streambed in violation of Fish and Game code section 1602, both the City and the regulatory agencies would likely hold the contractor liable, not the City. However, holding the contractor liable for a violation does not eliminate the risk to the City of landfill operations being put on hold or ceasing as a result of the violation.

Ground Lease with the Department of the Navy

The following is a list of general lease operational requirements:

- Use limits for each lease parcel (Lease §2)
- Height limits for operations (Lease § 2)
- Prior rights for utilities and access (Lease § 4, 8, 21)
- Acceptance of certain Navy waste for disposal at no charge (Lease § 5)
- No public group tours/exhibitions without consent (Lease § 8)
- Maintenance, repair, landscaping, site cleanliness (Lease § 9)
- No receipt/storage/disposal of hazardous substances/wastes without consent (Lease § 9)
- Closure and post-closure obligations (Lease § 9)
- Remediation obligations for unauthorized releases (Lease § 9)
- Risk of Loss Insurance (Lease § 14)
- Methane gas collection and disposal (Lease § 15)
- Air quality responsibilities (Lease § 17)

- Compliance w/Biological Opinion (Lease § 18)
- Special Use Restrictions such as: compliance with Bird Strike Hazard Management Plan, height limits, lighting limits, dust control, no open flaring of methane gas, maintain 25' buffer from underground fuel lines, electronic emissions/signals control. (Lease § 19)
- Environmental law compliance (Lease § 20)

Were the City to pose a threat to military operations, for example by posing a bird strike hazard, the military may terminate the lease. For that reason, the statement of work will include effective bird control requirements.

City of San Diego Fee Schedule

The service provider must follow regulations, policies, and fees identified in the City of San Diego Fee Schedule and Regulations for the Miramar Landfill established by San Diego Municipal Code sections 66.0127(c)(4) and Proposition 26. This will include any policies related to waste diversion.

Performance Standards

The City of San Diego expects the service provider (City employees or outside vendor) to maintain or exceed current service levels, by maintaining current performance standards. Unless otherwise indicated, the measures are annual figures.

Service Measure/Landfill Functions	Description	Current Service Level²	Data Source
Airspace utilization factor/Landfill Operations	Airspace utilization factor is used to determine the available space in the landfill for refuse burial. Monitoring airspace utilization provides the operator with data to ensure the most efficient and effective methods are utilized in refuse burial. This factor is calculated by dividing the tons of refuse disposed by the volume of area in cubic yards consumed in the landfill. The overall goal is to increase the airspace utilization factor by consuming less space at the landfill through enhanced compaction. Attachment 2 provides historical data related to the Air Space Utilization factor and volume of waste disposed from 2005 through 2010.	0.50	Refuse and Disposal database (RAD); Engineering Report
Tons of waste disposed/ Landfill Operations	The amount of tons of waste disposed of at the Miramar Landfill. The dynamic nature of landfills makes it difficult to set goals for tons of waste disposed, but incoming tonnage does depict resources needed in order to push, compact, and bury waste.	909,484	RAD
Ton of material processed/Greenery Operations	Tons of green waste processed into high quality mulch, compost and wood chips which is made available to the public. The tons diverted from the landfill, processed and marketed is essential in prolonging landfill life. Of the green waste currently processed, approximately 2,500 tons is food waste with the goal to implement a pilot	103,203	RAD

² Current service levels are based on FY2010 data. These values may vary annually due to external factors outside the control of the operator.

Service Measure/Landfill Functions	Description	Current Service Level²	Data Source
	program of accepting increased amounts of route-based mixed organic wastes to increase that to 15,000 tons within the next five years. This pilot will test the limits of the current technology to handle increased amounts of contamination that will invariably come from route-based organics. If the pilot deems that new technology is needed, a recommendation for that technology and a means of financing the investment will be brought forward for Council consideration.		
Total commodity sales/Greenery Ops	Revenue produced from sale of mulch, compost and wood chips.	\$450,071	SAP
No. of Violations received/Miramar Landfill and Greenery Operations	For some violations, a notice of violation is presented to the jurisdiction when State compliance and/or regulatory standards are not met. Federal agencies may issue compliance orders. The public can also seek compliance with certain local, state, and federal regulations, and may sue in the courts for compliance with various environmental laws.	1	Access database
No. of State Minimum Standard Notice of Violations (NOVs) received/Inactive Landfill sites and burn sites	A notice of violation is presented to the jurisdiction when State compliance and/or regulatory standards are not met. Regulatory inspections are conducted quarterly as well as annually on all inactive landfills and burn sites.	1	Access database
Tons of hazardous waste diverted from the Miramar Landfill/Hazmat Load Check	Hazardous waste such as flammable liquids, pesticides, oxidizers, asbestos, corrosives, shock sensitive chemicals, explosives, radioactive waste, medical waste, and polychlorinated biphenyls (PCBs) are illegal and dangerous to dispose of in landfills and are extremely harmful to the environment.	19.1	Access database
No. of solid waste inspections conducted/Hazmat Load Check	Conduct solid waste inspection in all areas of the Miramar landfill 7 days/wk, 361 days/year	6,600	Access database
No. of customers served at fee booth/Fee Booth	Number of transactions processed annually at the Miramar Landfill fee booth	350,305	RAD
No. of customers served per fee booth employee/Fee Booth	Number of transactions processed annually at the Miramar Landfill fee booth per FTE	21,894	RAD FY2010 Budget
Total revenue collected/Fee Booth	The Fee Booth collects and processes thousands of payments annually. A large amount of money is taken in daily (average cash/check intake is approximately \$30k) all of which comes through the fee booth.	Approx. \$31 million	SAP

Service Measure/Landfill Functions	Description	Current Service Level²	Data Source
Percent of extraction wells sampled annually/LMM	Monitoring gas and groundwater extraction wells is vital in mitigating greenhouse gas migration which could result in NOV's and subsequent regulatory fines.	100%	LMM Access database
Percent of surface water sampling and reporting for NPDES permits complete	Performing sampling, analysis, and preparation and submittal of quarterly and annual reports. Five sites and 27 sampling points. (Quarterly inspections are conducted on the City's landfill sites in addition to an annual report that is submitted to the regulatory agency. This report includes information from all quarterly inspections as well as water sampling data taken throughout the year.)	100 %	ESD Library
Percent of landfill gas emission and monitoring performed quarterly/LMM	Perform quarterly landfill gas surveys, sampling landfill gas monitoring probes, inspection of building gas detectors and analyze data. (180 gas probes)	100%	LMM Access database
Percent of groundwater well sampling and reporting completed as required under RWQCB Order 97-11/LMM	Perform groundwater sampling, analysis and preparation of quarterly and annual Reports. (56 groundwater wells in total at 5 sites) (Reports to regulatory agencies for groundwater are required on a semi-annual basis while the quarterly reports are for general monitoring and maintenance used for internal purposes. Sampling does take place on a quarterly basis, but the well samplings are staggered throughout the year to ensure all wells are sampled annually.)	100%	ESD Library

Service Provider Expectations

Specific methods to measure and monitor service provider expectations will be included in the Statement of Work. These measures will be stored and tracked electronically and data will be audited regularly. Customer satisfaction rates will be tracked via survey, or similar methods. The City currently has multiple surveys in place that can be used to track results.

- Expect service provider to track requests, complaints, other feedback and when this information will be transmitted to the City.
- Expect service provider to provide communication plan to the City about service mishaps or delays and related remedies, as well as overall performance information.
- Expect the service provider to fulfill the reporting requirements of all applicable federal, state and local government regulations and permits.

Please note that more detailed performance data will be included in the more detailed Statement of Work that will be developed in the next phase in preparation for issuing a Request for Proposals. We are describing all current functions, but judgments will be made in the final Statement of Work as to what is "in-scope" vs. "out of scope", based on legal analysis and market assessments.

Attachment 1
Landfill Operations Contract List

There are over 80 contractual agreements supporting the activities at both active and inactive landfill sites. The most significant contractual agreements are listed in the table below. The majority of contractual funds are expended on the Hawthorne Machinery Company contract which provides heavy duty equipment vital to the operation of the Miramar Landfill. The remaining agreements are for as-needed services (i.e., equipment parts, equipment service, and other miscellaneous active and inactive landfill supplies).

The Statement of Work team will determine the contracts that will become City furnished. In addition, to the extent that any contract is utilized for activities related to regulatory and lease requirements, the ultimate responsibility of compliance will be with the City.

#	Current Contractor	Brief Description	City/Contractor Oversight?	Risks Associated with Failure to Perform of Current Contractor
1	Able Patrol and Guard Service	Gate & roving guards.	TBD by SOW Team	Unauthorized access to landfill site causing possible risk to public and employee safety
2	Alpha Project for the Homeless	Labor crew	TBD by SOW Team	Non compliance with regulatory standards such as litter migration which could result in NOVs and subsequent fines
3	Atlas Portable Services	Pump septic tanks	TBD by SOW Team	Unsanitary working conditions for employees
4	B&B Equipment Rental & Service	Machine lease & service	TBD by SOW Team	Improper maintenance/service of equipment could pose risk to public and employee safety and could result in land filling delays due to lack of operable equipment
5	Chromascape (Amerimulch) Dye	Mulch dye	TBD by SOW Team	Inferior quality dyes could result in loss of revenue and established markets
6-12	Hawthorne Mach. Co.: 7 contracts for lease & service of equipment	Machine lease & service	TBD by SOW Team	<ul style="list-style-type: none">▪ Improper maintenance/service of equipment could pose risk to public and employee safety▪ Improper maintenance/service of equipment could result in land filling delays due to lack of operable equipment
13	Hawthorne Mach. Co D6N Svc	Machine service		
14	Hawthorne Mach. Co. C32 Engine Svc	Machine engine service		
15	Hawthorne Power Systems: 3412 Eng Svc			
16	NMS Janitorial Services	Custodial services	TBD by SOW Team	Unsanitary working conditions for employees
17	Richard J. Donovan Correctional Facility	Labor crew	TBD by SOW Team	Non compliance with regulatory standards such as litter migration which could result in NOVs and subsequent fines
18	Rule Steel (Parts), Diamond Z Mfg	Diamond Z tubgrinder parts	TBD by SOW Team	Delay in delivery of parts could result in loss of revenue and established markets Service delays could result in NOVs and subsequent fines due to the inability to process green waste
19	San Diego County Probation Dept	Labor crew	TBD by SOW Team	Non compliance with regulatory standards such as litter migration which could result in NOVs and subsequent fines

#	Current Contractor	Brief Description	City/Contractor Oversight?	Risks Associated with Failure to Perform of Current Contractor
20	SCS Field Services - Greenhouse gas monitoring	Gas monitoring	City	Non compliance with greenhouse gas regulatory standards which could result in NOV's and subsequent fines
21	Tarpomatic, Inc.	Tarpomatic machine parts	TBD by SOW Team	N/A
22	Unifirst Corp.	Uniform service	TBD by SOW Team	N/A
23	EnviroMatrix Analytical Svc	Water testing	City	Inaccurate analysis of water samples causing non compliance with surface water regulations could result in NOV's and subsequent fines
24	Geologic Associates (Professional Svcs)	Regulatory compliance	City	Inaccurate analysis of water samples and/or reporting to regulatory agencies causing non compliance with groundwater regulations could result in NOV's and subsequent fines
25	Geosyntec Consultants Inc. (Professional Svcs)	Volatile Organic Compound (VOC) migration mitigation	City	Non compliance with VOC and landfill gas migration could result in NOV's and subsequent fines
26	MWH Americas (Professional Svcs)	Ground water testing	City	Inaccurate analysis of water samples and/or reporting to regulatory agencies causing non compliance with groundwater regulations could result in NOV's and subsequent fines
27	QED Environmental Systems	Pumps	City	N/A
28	SCS Field Services - LFG system repair/maintenance (Professional Svcs)	Gas monitoring	City	<ul style="list-style-type: none"> Non compliance with landfill gas regulatory standards which could result in NOV's and subsequent fines Improper landfill gas system repair/maintenance could cause damage to the system resulting in additional costs

Attachment 2
Airspace Utilization Factor (AUF) 2005 – 2010

The table below provides the monthly refuse tons disposed and volume (in cubic yards) of space consumed at the Miramar Landfill from 2005 through 2010. The table also includes the AUF for each respective year which is calculated by taking the total refuse tons disposed divided by the volume consumed.

Month	2005		2006		2007		2008		2009		2010	
	Refuse Tons	Volume (cubic yards)	Refuse Tons	Volume (cubic yards)	Refuse Tons	Volume (cubic yards)	Refuse Tons	Volume (cubic yards)	Refuse Tons	Volume (cubic yards)	Refuse Tons	Volume (cubic yards)
January	120,886	265,750	111,378	236,702	99,595	212,210	106,837	171,124	69,930	166,390	64,590	131,961
February	107,254	246,700	104,002	215,503	82,316	176,703	99,541	233,287	64,620	153,632	70,579	127,102
March	144,633	249,516	111,199	224,967	105,640	207,185	100,008	173,019	76,798	167,358	82,980	165,579
April	137,708	273,614	108,382	224,282	102,423	211,914	85,848	118,915	75,591	198,202	73,403	155,919
May	136,518	273,304	126,181	256,503	106,620	228,812	91,802	170,079	80,539	198,202	79,269	166,775
June	143,713	297,699	136,492	245,158	103,546	217,404	87,928	206,112	84,551	205,154	89,575	189,818
July	140,704	294,922	118,992	234,538	106,093	217,878	92,748	221,874	84,628	228,036	86,052	179,068
August	149,694	295,039	134,036	249,572	115,905	244,961	87,150	214,149	80,969	140,823	83,774	177,715
September	137,131	283,426	117,068	256,617	99,857	215,462	89,275	217,448	79,973	159,836	81,489	175,998
October	128,465	293,870	111,812	281,232	102,736	214,590	86,195	217,729	74,217	162,504	75,393	130,530
November	120,798	227,161	106,899	233,962	111,599	197,677	73,314	190,864	64,601	127,975	72,773	125,603
December	109,075	230,020	94,754	191,000	111,831	128,722	72,705	160,721	67,300	142,974	72,606	118,892
Totals	1,576,579	3,231,021	1,381,195	2,850,036	1,248,161	2,473,518	1,073,351	2,295,321	903,716	2,051,086	932,483	1,844,960
AUF		0.488		0.485		0.505		0.468		0.441		0.505